

 ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DOMINION CITRUS, LTD.
Ontario Food Terminal
165 The Queensway Room 304
Etobicoke Ontario M8Y 1H8

and

FRESH FRUIT S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco

and

AGRI SOUSS
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco

and

EL BOURA
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco

and

GPA
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco

and

LIMONA SOUSS
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco

and

PRIAGRUS
P/C Fresh Fruit S.A.
Parcelle No 4 1 er Etage
Nouveau Port Anza
Agadir, Morocco

: CIVIL ACTION

07 - 50 -

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 JAN 26 PM 1:28

Plaintiffs
v.
M/V BADRINATH, her engines,
machinery, tackle, apparel, etc
and
AMER SHIPPING LTD.
602, Ghinis Building
58-60 Dhigenis Akritas Avenue
PO Box 27363, Nicosia 1644
Cyprus
and
ASHWATER NAVIGATION CO. Ltd.
602, Ghinis Building
58-60 Dhigenis Akritas Avenue
PO Box 27363, Nicosia 1644
Cyprus
and
SEATRADE REEFER CHARTERING N.V.
Atlantic House (4th fl.)
Noorderlaan 147, PO Box 10.012
2030 Antwerp 3, Belgium
and
SEATRADE GROUP, INC.
Atlantic House (4th fl.)
Noorderlaan 147, PO Box 10.012
2030 Antwerp 3, Belgium
and
SEATRADE USA
442 W. Kennedy Blvd., S. 290
Tampa, FL 33606 USA
Defendants.

: NO. 07-cv- 50


**MEMORANDUM IN SUPPORT OF
MOTION FOR ORDER AUTHORIZING ISSUANCE OF
PROCESS OF MARITIME ATTACHMENT AND GARNISHMENT**

Plaintiffs have moved pursuant to Supplemental Rule B for this Court to issue Process of
Maritime Attachment for the Defendant vessel.

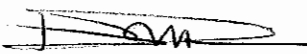
The Motion is based on the Verified Complaint and Declaration filed herewith, the allegations of which are incorporated by reference as if fully set forth herein. This is a claim within the maritime jurisdiction of this Court

The Defendant vessel owner is not found within this District within the meaning of Supplemental Rule B. Upon consideration of the Verified Complaint, issuance of Process of Maritime Attachment is proper pursuant to Supplemental Rule B. Plaintiffs therefore respectfully request that this Court grant their Motion.

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By: 
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MATTIONI, LTD.

BY: 
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STEPHEN J. GALATI, ESQUIRE
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(215) 629-1600

Dated: January 26, 2007